

20 February 2026

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Dear Leigh

State Significant Development Application SSD-81426710 (SSD Application)
Mixed-use development with in-fill affordable housing
Site: 138 Maroubra Road, Maroubra (Lot 1 DP506844 and Lot 2 DP506844)

1. We refer to correspondence from the Department of Planning, Housing and Infrastructure (**Department**) dated 16 January 2026 (**Department Letter**).
2. The Department Letter states that the Department has undertaken a preliminary assessment of the SSD Application and has identified a number of items to be addressed, as outlined in Attachment A to the Department Letter.
3. The Department Letter refers to a submission from Randwick City Council (**Council**) dated 24 December 2025 (**Council Letter**) which questions the methodology used to measure the height of the building. The Department has requested details of the methodology utilised to establish the base RL or the existing ground level, in light of the Council Letter.
4. You have requested our advice on the most appropriate way to measure the height of the building the subject of the SSD Application.

Executive Summary

5. The Council Letter proposes that the methodology for measuring building height should be *in accordance with the most recent direction of the NSW LEC*. We assume that this is a reference to the decision of the Court in *Merman Investments Pty Ltd v Woollahra Municipal Council* [2021] NSWLEC 1582 (**Merman**).
6. In the assessment of the previous development application (DA 80/2023) for the development of an eight-storey mixed-use development on the Site, the height of the development was calculated consistently with the principles in *Bettar v Council of the City of Sydney* [2014] NSWLEC 1070 (**Bettar**). This methodology was accepted by Council in the assessment before the Sydney Eastern City Planning Panel and during the subsequent Land and Environment Court proceedings.

7. For the reasons set out below, given the Site and its context, *Merman* is not to be preferred and should not be followed. The height of the building the subject of the SSD Application should be measured consistently with the principles in *Bettar*.

The Site and Context

8. The Site has an overall area of 1,517.4m² and is generally flat, with a modest slope of 320mm from the Maroubra Road boundary down towards the Piccadilly Place boundary (south to north).
9. The existing building on the Site covers the entirety of the Site and includes a basement that is built to all four boundaries.
10. The Site is zoned E2 Commercial Centre under the *Randwick Local Environmental Plan 2012 (RLEP)*.
11. The Site is located in Maroubra Junction, which comprises commercial uses, mixed-use developments, shop-top housing and residential flat buildings of varying height. Comparable mixed-use residential developments in Maroubra Junction generally range from 7 to 11 storeys in height.
12. The Site is immediately surrounded by the following:
 - (a) to the west – by the Maroubra NSW Police Station, located at the corner of Maroubra Road and Bruce Bennetts Place;
 - (b) to the north and east – by the 'Pacific Square' development, which comprises the Pacific Square shopping centre and several residential flat buildings ranging from 5 to 9 storeys in height;
 - (c) to the west, across Bruce Bennetts Place – by the 'Newington Towers' development, which comprises a 12 storey and 8 storey building; and
 - (d) to the south-west – by lower density residential housing.

Statutory Controls

13. Pursuant to clause 4.3 of the RLEP, the maximum permitted building height for the Site is 25m.
14. The SSD Application proposes to deliver affordable housing. Accordingly, clause 18 of *State Environmental Planning Policy (Housing) 2021 (Housing SEPP)* applies. Specifically, clause 18(2) states that:

The maximum building height for a building used for residential flat buildings or shop top housing is the maximum permissible building height for the development on the land plus an additional building height of up to 30%, based on a minimum affordable housing component calculated in accordance with subsection (3).
15. The SSD Application includes 64 dwellings, of which 13 dwellings will be affordable housing. Accordingly, it benefits from the entire 30% additional building height provided by clause 18 of the Housing SEPP, being an additional 7.5m. The maximum permitted building height for the SSD Application is therefore 32.5m.

16. The following provisions of the RLEP are relevant to the calculation of the maximum permitted building height for the proposed development:

Basement means the space of a building where the floor level of that space is predominantly below ground level (existing) and where the floor level of the storey immediately above is less than 1 metre above ground level (existing).

Building height (or height of building) means –

- (a) in relation to the height of a building in metres—the vertical distance from ground level (existing) to the highest point of the building, or
- (b) in relation to the RL of a building—the vertical distance from the Australian Height Datum to the highest point of the building,

including plant and lift overruns, but excluding communication devices, antennae, satellite dishes, masts, flagpoles, chimneys, flues and the like.

Ground level (existing) means the existing level of a site at any point.

17. As discussed below, the calculation of the height of the proposed development turns on the identification of the *ground level (existing)* of the Site as defined in the RLEP.
18. The approaches to the identification of *ground level (existing)* differ in both *Merman* and *Bettar*. The measurement of height in accordance with the principles in *Merman* results in a material increase in height above that where height is measured in accordance with the methodology in *Bettar*. This is demonstrated in the Council Letter which, adopting *Merman*, measures maximum building height as **35.28m**, which exceeds the *AFH Bonus height* of 32.5m by 8.55%, necessitating a Clause 4.6 Variation Request.
19. The SSD Application measures maximum building height as **32.5m**, measuring height from ground level (existing) identified in accordance with the methodology in *Bettar*, as detailed below.

Prior Development Proposal (DA 80/2023)

20. In the assessment of the previous development application (DA 80/2023) for the development of an eight-storey mixed-use development on the Site, the height of the development was calculated consistently with the principles in *Bettar*. This methodology was accepted by Council in the assessment before the Sydney Eastern City Planning Panel, and during the subsequent Land and Environment Court proceedings. There was agreement as to the maximum height of the proposed development.
21. Consistently with *Bettar*, the measurement of height was based on the existing ground level as identified by survey, with ground level measured from the level of the footpath at either end of the Site boundary and extrapolated across the Site to measure the vertical distance to the highest point of the building.
22. Contrary to this previous approach, Council now suggests that the methodology in *Merman* should be applied to measure the existing ground level of the Site. Specifically, the Council Letter states as follows:

Council's methodology for measuring building height is to take the existing ground level (being underside of the existing basement level slab) RL 22.52 and calculate what the building height is based off the maximum height of the building in accordance with the most recent direction of the NSW LEC.

23. A close analysis of the decisions in *Bettar* and *Merman*, together with other relevant authority, indicates that in the context of the Site, the approach in *Bettar* is to be preferred in the assessment of the SSD Application.

Relevant Authority

Bettar v Council of the City of Sydney [2014] NSWLEC 1070

24. In *Bettar*, the parties' planning experts disagreed on the level that constituted the existing ground level on the site, as follows (at [33] – [34]):

- (a) Mr Betros (for the applicant) considered that the existing ground level of the site was the finished floor level of the ground floor of the existing building on the site and the existing level of the basement, which occupied a small area in the north-eastern corner of the site.
- (b) Mr Chamie (for the Council) considered that the existing ground level of the site was the level of the footpath at the site boundary, and this level should be extrapolated across the site to measure the vertical distance to the highest point of the building.

25. Commissioner O'Neill commented at [36] that (**emphasis added**):

*The definitions of basement, height of buildings and ground level in LEP 2012 have come from the dictionary of the standard instrument (Standard Instrument – Principal Local Environmental Plan). Ground level (existing) is defined in LEP 2012 as the existing level of the site at any point. **This definition of existing ground level is sufficiently vague that both expert planners' reasoning can be argued, because the particular difficulty in applying this definition to this site is that the existing building occupies the whole of the site area and so there is no 'ground' (as in soil/garden/paving) around the building and on the site, from which the existing ground level can be determined by a site survey.***

26. When considering Mr Betros' approach for defining existing ground level, Commissioner O'Neill commented at [38] that (**emphasis added**):

*... Using this method, it is conceivable that on one property, the existing ground level will be taken as two storeys below ground level where there is a basement (as in the example raised by Mr Betros) and on the adjoining property, the existing ground level will be taken as being well above ground level where a building occupies the entire site and the finished floor level is higher than the footpath, **resulting in adjoining sites with starkly different height limits arising from the same development standard.***

27. Commissioner O'Neill also relevantly applied the definition of 'basement' when considering Mr Betros' approach, commenting at [39] that (**emphasis added**):

... the definition of basement in LEP 2012 is the space of a building where the floor level of that space is predominantly below existing ground level and where the floor level of the storey immediately above is less than 1m above existing ground level *[italics added]*. **From this definition, it does not follow that existing ground level becomes the level of the basement floor or the soil beneath the basement following the construction of a basement. A basement is, by definition, below ground level and so the level of the basement floor cannot be taken to be existing ground level.**

28. Commissioner O'Neill favoured the approach taken by Mr Chamie, commenting at [41] that (**emphasis added**):

*I prefer Mr Chamie's approach to determining the existing ground level because **the level of the footpath at the boundary bears a relationship to the context and the overall topography** that includes the site and remains relevant once the existing building is demolished. ...*

29. Ultimately, as noted at [42], nothing turned on which definition was preferred, as the proposed development exceeded the building height development standard.

Merman Investments Pty Ltd v Woollahra Municipal Council [2021] NSWLEC 1582

30. *Merman* involved a steeply sloping site, with an overall fall of approximately 24m. Commissioner O'Neill adopted a different approach to measuring natural ground level than that applied in *Bettar*.

31. In this particular case, Commissioner O'Neill commented at [73] – [74] that (**emphasis added**):

*The existing level of the site at a point beneath the existing building is the level of the land at that point. I agree with Mr McIntyre that **the ground level (existing) within the footprint of the existing building is the extant excavated ground level on the site** and the proposal exceeds the height of buildings development standard in those locations **where the vertical distance, measured from the excavated ground level within the footprint of the existing building, to the highest point of the proposal directly above, is greater than 10.5m.** The maximum exceedance is 2.01m at the north-eastern corner of the Level 3 balcony awning.*

The prior excavation of the site within the footprint of the existing building, which distorts the height of buildings development standard plane overlaid above the site when compared to the topography of the hill, can properly be described as an environmental planning ground within the meaning of clause 4.6(3)(b) of LEP 2014.

32. Relevantly, Commissioner O'Neill confirmed at [138] that (**emphasis added**):

The granting of consent to the proposal does not create a planning precedent, because the characteristics of the site and the merits of the proposal are unique.

33. *Merman* and *Bettar* have been described as 'the two common methods of extrapolating building heights': *MacJohn v Mosman Municipal Council* [2026] NSWLEC 1023.

34. Other recent authorities are also instructive in the way in which the height of the proposed building is to be measured.

Stamford Property Services Pty Ltd v City of Sydney & Anor [2015] NSWLEC 1189 (**Stamford**)

35. *Stamford* involved a site with a topography that fell from the south-eastern corner towards the north-western corner, with a change of level of approximately 6.8m.
36. The parties' experts agreed that basement levels on the site should not be used to determine *ground level (existing)*, but had competing views as to how existing ground level should be calculated. Ultimately, Commissioner Pearson and Acting Commissioner Smithson favoured the approach taken by Council's town planner, who suggested at [266] that the height should be measured from the ground level of the site where known and from the footpath level at the site boundaries extrapolated across the site, as this would reflect the sloping topography of the land, a methodology consistent with *Bettar*.
37. In articulating their findings, Commissioner Pearson and Acting Commissioner Smithson commented at [285] – [286] that (**emphasis added**):

We agree with the approach adopted by O'Neill C in Bettar, although we would not rely, as O'Neill C does, on the stated objectives of the height development standard, since while the definition of "ground level (existing)" is common to those local environmental plans adopting the Standard Instrument, the objectives for height standards vary from instrument to instrument. In our view, Bettar provides a practical operation to the definition, both for a greenfield site and, as here, a modified site in a built environment. It places the proposed building in its context, rather than relying on the present built form of any existing development on a site.

Reliance on the existing built form ... means that circumstances such as the extent of excavation from site to site could lead to different height limits applying to adjoining buildings on redevelopment of any of those sites. On the information available for the site, application of Bettar results in a sloping plane across the site, and we agree with Ms Robinson that that reflects the relationship of the proposed development to the overall topography that includes the site.

Tony Legge v Council of the City of Sydney [2016] NSWLEC 1424 (**Tony Legge**)

38. As with *Bettar*, *Stamford* and *Merman*, the parties' experts in *Tony Legge* disagreed on the level that constituted the existing ground level on the site.
39. Ultimately, Commissioner Dickson concurred with the approach taken in *Bettar*, commenting at [41] – [42] (**emphasis added**):

I concur with the approach taken in Bettar v Council of the City of Sydney [2014] NSWLEC 1070 which determines that in circumstances where the site is wholly built out it is appropriate to take the levels of the site at its interface with the public domain. This approach was reinforced in Stamford Property Services Pty Ltd v City of Sydney & Anor [2015] NSWLEC 1189 for the value it provides in placing 'the proposed building in its context, rather than relying on the present built form of any existing development on a site'.

This approach is appropriate in the circumstances of this case as the existing ground level of the intersection of the site with the footpath remains relevant before, during and after development and goes to the intent of the control (refer [16]) which is to consider the suitability of the relationship of the proposed building to its context. I don't accept the applicant position that a site survey of levels as they existed prior to an executed development is the starting point for the determination of height. The consideration of the development application relies on the consideration of all matters, including site conditions, at the time of the application.

40. In decisions following *Merman*, the Court has continued to apply the methodology in *Bettar* in appropriate circumstances: see *Platform Project Services v Mosman Municipal Council* [2022] NSWLEC 1516. In other decisions, the Court has adopted an approach of measuring height utilising both methodologies: see *Hayek v Randwick City Council* [2024] NSWLEC 1631; *Gladesville WW Pty Ltd v City of Ryde* [2025] NSWLEC 1042 (***Gladesville***).

Gladesville WW Pty Ltd v City of Ryde [2025] NSWLEC 1042

41. In *Gladesville*, Commissioner Horton made the following comments at [22] – [23]:

The site, and some properties adjoining the site, appear to have been the subject of cut and fill in the past so that a form of benching is suggested on the subject site, and those to the north and west of the site.

*As such, the Height request states its primary reliance is on height as determined in the decision of *Merman Investments Pty Ltd v Woollahra Municipal Council* [2021] NSWLEC 1582 (*Merman method*). By reference to this method, a level is taken at the existing basement, less 300mm for the assumed thickness of the slab, establishes the level of historical excavation. **Adopting the Merman method artificially exaggerates the height in numerical terms when compared with height measured from an interpolated level that is consistent with the method described in *Bettar v Council of the City of Sydney* [2014] NSWLEC 1070 ('*Bettar*') (the *Bettar method*).***

42. The Court did not make a finding as to which method was appropriate, noting at [26] that as in *Bettar*, at [42], *nothing turns on which definition is adopted, as the proposal exceeds the height standard regardless of the method used.*

Analysis

43. Having regard to the relevant definitions in the RLEP and the authorities considered above, in our view the approach adopted in *Bettar* is to be preferred over that in *Merman* when measuring the height of the proposed building for the purposes of clause 4.3 of the RLEP.
44. As with the site in *Bettar*, the existing building occupies the whole of the Site area, so that there is no 'ground' (soil/garden/paving) around the building and on the Site from which the existing ground level may be determined.
45. Consistently with the approach taken in *Bettar* as accepted by Council in the assessment and determination of the previous development proposal (DA 80/2023), the existing ground level of the Site should therefore be taken to be the level of the

footpath at the Site boundary, extrapolated across the Site to measure the vertical distance to the highest point of the building.

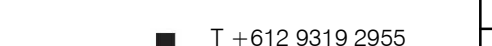
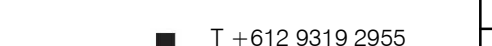
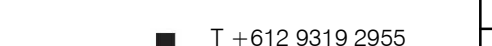
46. We do not agree with Council's now asserted position that the existing ground level should be taken as being the underside of the existing basement slab, at RL 22.52. As noted by Commissioner O'Neill in *Bettar*, the definition of 'basement' in the Standard Instrument clearly describes a basement as the *space of a building where the floor level of that space is predominantly below ground level (existing) and where the floor level of the storey immediately above is less than 1 metre above ground level (existing)*. It therefore does not follow that existing ground level is the level of the basement floor or the soil beneath the basement.
47. As demonstrated in the **attached** mark-up of the Section C drawing prepared by DJRD Architects, the floor level of the storey immediately above the basement is less than 1 metre above ground level (existing), being the existing footpath levels derived from the survey data. Accordingly, the basement floor for the development the subject of the SSD Application satisfies the definition of 'basement' in the RLEP, and ground level (existing) must therefore be taken to be above the basement level of the development.
48. Context must be the primary consideration when determining the methodology for measuring building height. There appears to be a consistent ground level across the Site and the adjacent land. The Site is surrounded by large mixed-use developments including the Pacific Square building, which border the Site to the north and east and comprises the Pacific Square shopping centre and several residential flat buildings between 5 and 9 storeys in height.
49. Adopting the methodology in *Merman* would artificially exaggerate the height of the development when compared with height measured from an interpolated level which is consistent with that of the adjoining properties. This methodology would result in a building on the Site that sits considerably lower than the adjoining Pacific Square building and the Newington development further to the west of the Site.
50. As noted in *Stamford* at [285], *Bettar* provides a practical operation to the definition of ground level (existing), appropriately placing the proposed building in its context rather than relying on the present built form of any existing development on the Site.
51. For the reasons set out above, the proposed development complies with the maximum permitted building height of 32.5m as measured in the SSD Application.

Yours faithfully



Paul Lulich
Partner



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